

U.S. District Court
Southern Illinois

Charmaine Smith,
Plaintiff,

Case No.: 19-CV-388 JPG-GSC

v.

American Water Resources of Tennessee,
Memphis Light, Gas, and Water,
Defendants.

Civil Complaint

Parties

1. Charmaine Smith is the Pro Se Plaintiff and is a Citizen of Tennessee
2. American Water Resources of Tennessee is a Defendant and is a Public Utility
3. Memphis Light, Gas, and Water is a Defendant and a Public Utility Corporation

Jurisdiction

1. Federal Question
2. Diversity
- Amount in Controversy: \$4,000,000.00

Statement of Facts

Defendants American Water Resources of Tennessee and Memphis Light, Gas, and Water are liable for harm caused through their Targeted Advertising and for Data Breach and Theft by:

1. Enabling/Facilitating Remote Access, Use, Manipulation, Control, Denial, and/or Theft of Utility Services,
2. Enabling Remote Hijack of Water Service,
3. Enabling Damage to the Water Line through Remotely Accessed Water Service and malicious increase and/or decrease of water pressure and temperature,
4. Enabling Remote Access, Use, Manipulation, Control, Denial, and/or Theft of Electric and Gas Services and Lines,
5. Causing Wear-and-Tear, Malfunction, and Damage of Appliances and Electronics through deliberate damage and/or destruction to public and private property over the internet via covert, unlawful/illegal, and 3rd-party remote access; Cyber-destruction, Cyber-impairment, and/or Cyber-Vandalism for the purpose of Fraud-in-the-Inducement.

Claims

1. Consumer Protection Act
2. Title 18 U.S.C. § 2520 - Wire, Oral, and Electronic Interception
3. Lanham Act - False Advertising
4. Tort - Strict Liability for Defective Design

Request for Relief

Plaintiff Charmane Smith requests a Monetary Award of \$4,000,000.00 and all Court, Attorney, U.S. Marshal, Litigation, and Collection Costs, Fees, Expenses, and Interest.

Dated:

Respectfully,

April 3, 2019

Charmane Smith, Plaintiff
4952 Willow Road
Memphis, TN 38117
(901) 761-1678

Defendants:

1. American Water Resources of Tennessee
1420 Discovery Pkwy
Alton, IL 62002

Defendants:

2. Memphis Light Gas and Water
220 S. Main Street
Memphis, TN 38103

MEMPHIS
TN 380
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Attn: Clerk Office
U.S. District Court - Southern
750 Missouri Avenue
East St. Louis, IL 62201

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US MARSHALS

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CLERK, U.S. DISTRICT
SOUTHERN DISTRICT OF
EAST ST. LOUIS OFFICE